

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

WILUS INSTITUTE OF STANDARDS  
AND TECHNOLOGY INC.,

*Plaintiff,*

v.

HP INC.,

*Defendant.*

Civil Action No. 2:24-cv-0752-JRG-RSP

(Lead Case)

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WILUS INSTITUTE OF STANDARDS  
AND TECHNOLOGY INC.,

*Plaintiff,*

v.

SAMSUNG ELECTRONICS CO., LTD.  
and SAMSUNG ELECTRONICS  
AMERICA, INC.,

*Defendants.*

Civil Action No. 2:24-cv-0746-JRG-RSP

(Member Case)

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO  
MOVE, ANSWER, OR OTHERWISE RESPOND TO PLAINTIFF’S  
COMPLAINT FOR PATENT INFRINGEMENT IN THE ’746 CASE**

Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (together, “Samsung”) respectfully move the Court for an order extending the time for Samsung to move, answer, or otherwise respond to Plaintiff Wilus Institute of Standards and Technology Inc.’s (“Plaintiff”) Complaint for Patent Infringement.

The deadline for Samsung to move, answer, or otherwise respond to Plaintiff’s Complaint for Patent Infringement (“Complaint”) (Dkt. No. 1) is January 6, 2025. At this time, Samsung requests an extension of time up to and including January 16, 2025, to move, answer, or otherwise respond to Plaintiff’s Complaint in the ’746 Case. Good cause exists for this extension because it will align the deadlines to move, answer, or otherwise respond to Plaintiff’s Complaint among the

related cases, which include the related Samsung case. *See Wilus Inst. of Standards and Tech. Inc. v. Samsung Elecs. Co., Ltd.*, No. 2:24-CV-00765-JRG, Dkt. No. 11 (E.D. Tex. Oct. 2, 2024). This extension will not impact any other deadlines.

Samsung represents that this extension is not sought for the purposes of delay but rather so that justice may be served. Counsel for Samsung met and conferred with counsel for Plaintiff, and counsel for Plaintiff indicated that Plaintiff is unopposed to the relief sought in this Motion.

Samsung's agreement with Plaintiff should not be construed as a waiver of any other rights or defenses, including, for instance, Samsung's right to file counterclaims, affirmative defenses, or to otherwise challenge the validity of the subject patents.

Accordingly, Samsung respectfully requests that the time in which Samsung is required to move, answer, or otherwise respond to Plaintiff's Complaint in the '746 Case be extended from January 6, 2025, up to and including January 16, 2025.

Dated: January 3, 2025

Respectfully submitted,

*/s/ Melissa R. Smith*

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Melissa R. Smith  
Texas Bar No. 24001351  
**GILLAM & SMITH, LLP**  
303 South Washington Avenue  
Marshall, Texas 75670  
Telephone: (903) 934-8450  
Facsimile: (903) 934-9257  
Email: melissa@gillamsmithlaw.com

*Attorney for Defendants  
Samsung Electronics Co., Ltd. and  
Samsung Electronics America, Inc.*

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that counsel for Samsung met and conferred with counsel for Plaintiff to discuss the substantive relief sought in this Motion pursuant to Local Rule CV-7(h). Counsel for Plaintiff indicated that Plaintiff is unopposed to the relief sought in this Motion.

*/s/ Melissa R. Smith*

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Melissa R. Smith

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic services are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on January 3, 2025.

*/s/ Melissa R. Smith*

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Melissa R. Smith